

HONORABLE KAREN A. OVERSTREET

HEARING DATE: FRIDAY, DECEMBER 4, 2009

HEARING TIME: 9:30 A.M.

LOCATION: SEATTLE, COURTROOM 7206

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

ENTELLIUM CORPORATION
PO Box 53126
Bellevue, WA 98015
Tax ID 20-0596005,

Debtor.

ENTELLIUM N.A.
PO Box 53126
Bellevue, WA 98015
Tax ID 98-0388185,

Debtor.

Lead Case No. 08-18286
(Administratively Consolidated with
08-18287)

ENTELLIUM CORPORATION'S REPLY
IN SUPPORT OF MOTION FOR ORDER
ALLOWING AND DISALLOWING
CLAIMS AGAINST DEBTOR
ENTELLIUM CORPORATION

Entellium Corporation, debtor in possession herein ("Debtor") replies as follows to the letter response filed by Infotriever, Inc. ("Infotriever") to the Debtor's Motion for Order Allowing and Disallowing Claims ("Motion").

Infotriever provided a program that was embedded within Entellium's software. Infotriever was paid royalties based on sales by the Debtor's wholly owned subsidiary and the operating entity, Entellium N.A. ("ENA"), which is also a debtor in possession in these jointly administered

1 bankruptcy cases. All payments to Infotriever were made by ENA. Based on this, the Debtor and
2 ENA proposed disallowance of Infotriever's claim as against the Debtor, but allowance of its claim in
3 full as against ENA.

4 Concurrent with the filing of its Motion, the Debtors also filed a joint motion for approval of a
5 settlement agreement ("Settlement Agreement"). The deadline for objections to the motion for
6 approval of the Settlement Agreement has passed, and no party has objection to that motion. As
7 described in more detail in the Settlement Agreement, all general unsecured claims will be treated
8 equally and receive pro rata distributions from sales proceeds and other assets after payment of
9 secured claims against the Debtor, costs of administration of both estates, and ENA priority unsecured
10 claims. However, pursuant to the Settlement Agreement, a claim against ENA has an added
11 protection in that it will receive a minimum of \$275,000 for distribution to general unsecured
12 creditors. Thus Infotriever actually receives additional protection by treatment of its claim as one
13 against ENA.

14 For the reasons set forth above, the Debtor respectfully requests that the Court overrule
15 Infotriever's response and grant the Debtor's Motion for Order Allowing Disallowing Claims.

16 DATED this 1st day of December, 2009.

17 BUSH STROUT & KORNFIELD

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19 By /s/ Katriana L. Samiljan
Katriana L. Samiljan, WSBA #28672
20 Attorneys for Entellium Corporation
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